

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

SEAN O'DONOVAN,

Defendant

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Crim. No. 22-10141-WGY

**ASSENTED-TO MOTION FOR EXTENSION OF TIME  
(TO SEPTEMBER 30, 2022) TO FILE OPPOSITION TO DEFENDANT'S  
MOTION TO DISMISS FOR "OUTRAGEOUS GOVERNMENT CONDUCT"**

The government hereby requests an extension of time—from September 22, 2022 to September 30, 2022—to file its response to Defendant Sean O'Donovan's motion to dismiss the Indictment for "outrageous government conduct." ECF No. 22 (the "Motion"). As grounds therefore, the government submits that undersigned counsel is preparing for trial in *United States v. Pullman and Lynch*, 19-CR-10435-DPW, which was originally scheduled to begin on September 12, 2022, but was briefly delayed pending a September 21, 2022 status conference.

Counsel for Defendant has assented to the relief requested herein.

Dated: September 15, 2022

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney

COREY R. AMUNDSON  
Chief, Public Integrity Section  
U.S. Department of Justice

By: Kristina E. Barclay  
Kristina E. Barclay  
Assistant United States Attorney

By: Jonathan E. Jacobson  
Jonathan E. Jacobson  
Trial Attorney, Public Integrity Section  
U.S. Department of Justice

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of September 2022 I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing to all attorneys of record.

/s/ Kristina E. Barclay  
Kristina E. Barclay  
Assistant United States Attorney